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EXHIBIT 4

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13 *Emergency Services*

14
15 **UNITED STATES BANKRUPTCY COURT**
NORTHERN DISTRICT OF CALIFORNIA
16 **SAN FRANCISCO DIVISION**

17 In re:
18 PG&E CORPORATION
19 - and -
20 PACIFIC GAS AND ELECTRIC
COMPANY,

21 Debtors.

- 22 ☐ Affects PG&E Corporation
23 ☐ Affects Pacific Gas and
Electric Company
24 ☒ Affects both Debtors

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**CALIFORNIA GOVERNOR'S OFFICE OF
EMERGENCY SERVICES' RESPONSE TO
OFFICIAL COMMITTEE OF TORT
CLAIMANTS' FIRST SET OF REQUESTS
FOR ADMISSION**

25
26 The California Governor's Office of Emergency Services ("Cal OES"), for itself and no
27 other agency, hereby responds to *Official Committee of Tort Claimants' First Set of Requests for*
28 *Admission to California Governor's Office of Emergency Services.*

1 **GENERAL OBJECTION:**

2 Cal OES objects that the Requests for Admission are premised on the incorrect
3 assumption that there is a contested matter over which the Bankruptcy Court has jurisdiction.
4 Because the Omnibus Objection of the Official Committee of Tort Claimants (Substantive) to
5 Claims Filed by California Governor's Office of Emergency Services (Claim Nos. 87748, 87754,
6 & 87755) was not served as required by Rule 3007(a)(2), there is no contested matter over which
7 the Bankruptcy Court has jurisdiction and there is no authority for any party to serve discovery on
8 Cal OES. Response to the Requests for Admission is without waiver of the jurisdictional issues.

9
10 **REQUEST FOR ADMISSION NO. 1:**

11 Admit that Cal OES did not perform any fire suppression services in connection with the
12 Butte Fire.

13 **RESPONSE:**

14 In connection with the Butte Fire, Cal OES coordinated mutual aid for fire suppression
15 with in-state and out-of-state agencies, facilitated the employment of resources for fire
16 suppression (including several of Cal OES's fire trucks and other fire equipment), and reimbursed
17 agencies for the costs of fire suppression services. Except as stated, Cal OES admits it did not
18 perform any fire suppression services in connections with the Butte Fire.

19
20 **REQUEST FOR ADMISSION NO. 2:**

21 Admit that Cal OES did not provide any rescue or emergency medical services in
22 connection with the Butte Fire.

23 **RESPONSE:**

24 In connection with the Butte Fire, Cal OES coordinated mutual aid for rescue and
25 emergency services with in-state and out-of-state agencies, facilitated the employment of
26 resources for rescue or emergency medical services, and reimbursed agencies for rescue and
27 emergency services. Except as stated, Cal OES admits it did not provide any rescue or
28 emergency medical services in connection with the Butte Fire.

1 **REQUEST FOR ADMISSION NO. 3:**

2 Admit that Cal OES did not investigate the cause the Butte Fire.

3 RESPONSE:

4 Admit.

6 **REQUEST FOR ADMISSION NO. 4:**

7 Admit that Cal OES did not make any reports regarding the cause of the Butte Fire.

8 RESPONSE:

9 Admit.

11 **REQUEST FOR ADMISSION NO. 5:**

12 Admit that Cal OES did not provide any emergency services to confine, prevent, or
13 mitigate the release, escape, or burning of hazardous substances in connection with the Butte Fire.

14 RESPONSE:

15 Part of Cal OES' mission is to collaborate and coordinate the California Mutual Aid
16 System. In connection with the Butte Fire, Cal OES collaborated and coordinated mutual aid,
17 mission tasked other state departments (such as the Department of Toxic Substances Control) to
18 confine, prevent, or mitigate the release, escape, or burning of hazardous substances, and
19 reimbursed other agencies' costs in to confining, preventing, or mitigating the release, escape, or
20 burning of hazardous substances. Except as stated, Cal OES admits its personnel did not provide
21 any emergency services to confine, prevent, or mitigate the release, escape, or burning of
22 hazardous substances in connection with the Butte Fire.

1 **REQUEST FOR ADMISSION NO. 6:**

2 Admit that Cal OES did not perform any fire suppression services in connection with the
3 North Bay Fires.

4 RESPONSE:

5 In connection with the North Bay Fires, Cal OES coordinated mutual aid for fire
6 suppression with in-state and out-of-state agencies, facilitated the employment of resources for
7 fire suppression (including several of Cal OES's fire trucks and other fire equipment), and
8 reimbursed agencies for the costs of fire suppression services. Except as stated, Cal OES admits
9 it did not perform any fire suppression services in connections with the North Bay Fires.
10

11 **REQUEST FOR ADMISSION NO. 7:**

12 Admit that Cal OES did not provide any rescue or emergency medical services in
13 connection with the North Bay Fires.

14 RESPONSE:

15 In connection with the North Bay Fires, Cal OES coordinated mutual aid for rescue and
16 emergency services with in-state and out-of-state agencies, facilitated the employment of
17 resources for rescue or emergency medical services, and reimbursed agencies for rescue and
18 emergency services. Except as stated, Cal OES admits it did not provide any rescue or
19 emergency medical services in connection with the North Bay Fires.
20

21 **REQUEST FOR ADMISSION NO. 8:**

22 Admit that Cal OES did not investigate the cause the North Bay Fires.

23 RESPONSE:

24 Admit.
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1 **REQUEST FOR ADMISSION NO. 9:**

2 Admit that Cal OES did not make any reports regarding the cause of the North Bay Fires.

3 RESPONSE:

4 Admit.

6 **REQUEST FOR ADMISSION NO. 10:**

7 Admit that Cal OES did not provide any emergency services to confine, prevent, or
8 mitigate the release, escape, or burning of hazardous substances in connection with the North Bay
9 Fires.

10 RESPONSE:

11 Part of Cal OES' mission is to collaborate and coordinate the California Mutual Aid
12 System. In connection with the North Bay Fires, Cal OES collaborated and coordinated mutual
13 aid, mission tasked other state departments (such as the Department of Toxic Substances Control)
14 to confine, prevent, or mitigate the release, escape, or burning of hazardous substances, and
15 reimbursed other agencies' costs in to confining, preventing, or mitigating the release, escape, or
16 burning of hazardous substances. Except as stated, Cal OES admits its personnel did not provide
17 any emergency services to confine, prevent, or mitigate the release, escape, or burning of
18 hazardous substances in connection with the North Bay Fires.

20 **REQUEST FOR ADMISSION NO. 11:**

21 Admit that Cal OES did not perform any fire suppression services in connection with the
22 Camp Fire.

23 RESPONSE:

24 In connection with the Camp Fire, Cal OES coordinated mutual aid for rescue and
25 emergency services with in-state and out-of-state agencies, facilitated the employment of
26 resources for rescue or emergency medical services, and reimbursed agencies for rescue and
27 emergency services. Except as stated, Cal OES admits it did not provide any rescue or
28 emergency medical services in connection with the Camp Fire.

1 **REQUEST FOR ADMISSION NO. 12:**

2 Admit that Cal OES did not provide any rescue or emergency medical services in
3 connection with the Camp Fire.

4 RESPONSE:

5 In connection with the Camp Fire, Cal OES paid for rescue and emergency services of
6 other in-state and out-of-state agencies, coordinated mutual aid with in-state and out-of-state
7 agencies, and facilitated the employment of resources for rescue or emergency medical services.
8 Except as stated, Cal OES admits it did not provide any rescue or emergency medical services in
9 connection with the Camp Fires.

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11 **REQUEST FOR ADMISSION NO. 13:**

12 Admit that Cal OES did not investigate the cause the Camp Fire.

13 RESPONSE:

14 Admit.

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16 **REQUEST FOR ADMISSION NO. 14:**

17 Admit that Cal OES did not make any reports regarding the cause of the Camp Fire.

18 RESPONSE:

19 Admit.

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21 **REQUEST FOR ADMISSION NO. 15:**

22 Admit that Cal OES did not provide any emergency services to confine, prevent, or
23 mitigate the release, escape, or burning of hazardous substances in connection with the Camp
24 Fire.

25 RESPONSE:


26 Part of Cal OES' mission is to collaborate and coordinate the California Mutual Aid
27 System. In connection with the Camp Fire, Cal OES collaborated and coordinated mutual aid,
28 mission tasked other state departments (such as the Department of Toxic Substances Control) to

1 confine, prevent, or mitigate the release, escape, or burning of hazardous substances, and
2 reimbursed other agencies' costs in to confining, preventing, or mitigating the release, escape, or
3 burning of hazardous substances. Except as stated, Cal OES admits its personnel did not provide
4 any emergency services to confine, prevent, or mitigate the release, escape, or burning of
5 hazardous substances in connection with the Camp Fire.

6
7 Dated: January 20, 2020

Respectfully submitted,

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